

FILED
U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION
2017 JAN 30 PM 2:22
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA §
 §
V. § Cause No. 4:16-CR-132-A
 §
 §
CHARLES BEN BOUNDS, ET AL. §
 §

DEFENDANT MEGAN KEMP'S
MOTION FOR DOWNWARD DEPARTURE

TO THE HONORABLE JOHN MCBRYDE, UNITED STATES DISTRICT COURT
JUDGE:

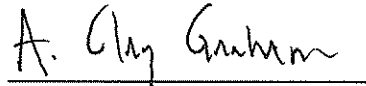
Now comes Defendant, Megan Kemp ("Ms. Kemp"), by and through her attorney of record, A. Clay Graham, and files this Motion for Downward Departure for the sentencing scheduled for February 17, 2017. In order to avoid unwarranted repetition, Defendant adopts the argument and analysis set forth in her Sentencing Memorandum to be filed under seal with the Court pursuant to this Court Sentencing Scheduling Order, and reurges those arguments as if restated in their entirety herein.

III. Prayer

PREMISES CONSIDERED, DEFENDANT Megan Kemp respectfully requests

that this Court depart downward or vary under 28 U.S.C. § 3553(a) as requested herein and in her Sentencing Memorandum to be filed with the Court, and assess a sentence of **188 months**. Defendant additionally prays for any other relief to which she may show herself justly entitled.

Respectfully submitted,



A. Clay Graham

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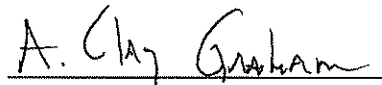
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Counsel for Defendant

Megan Kemp

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was provided to counsel for the government by a manner compliant with the rules on January 30, 2017.



A. Clay Graham